R E M A R K S

Applicants submit new claims 12-14. Claims 1-14 are now pending in the application. Applicants amend claims 1 and 8-9 for clarification, and submit claims 12-14 to round out the scope of the claimed invention. Applicants refer to Figs. 7 and 10, and their corresponding description in the specification—including page 14, lines 7-17 and page 15, lines 20-28—for exemplary embodiments of and support for the claimed invention. No new matter has been added.

Claims 1-7 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter.

Applicants amend claim 1 in accordance with the Examiner's suggestion, and respectfully request that the Examiner withdraw the § 101 rejection.

Claims 1-11 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,597,689 to Chiu et al. Applicants amend claims 1 and 8-9 in a good faith effort to clarify the invention as distinguished from the cited reference, and respectfully traverse the rejection.

The Examiner maintained the rejection by arguing that the description in Chiu et al. of PVC being statically set up and torn down "over time" discloses the claimed connection change features. In particular, the Examiner contended that

> "since the system of Chiu is accordingly changed over time, which requires storage of such changes, Chiu clearly taught and/or anticipated the claimed feature of changing the type of a connection to an external switching unit in the connection data after the connection to the external switching unit was set up." Page 5, lines 2-6 of the Office Action.

Applicants respectfully submit that even assuming, arguendo, that Chiu et al. disclose switching a type of connection between PVC and SVC and changing the type of connection to an external switching unit from a variable connection type to a fixed connection type in

84252248_1

connection data, the cited portions of <u>Chiu et al.</u> still do not include any disclosure of the type

of connection being changed from SVC to PVC in the connection data <u>before the SVC</u>

<u>connection is reset</u>.

As an exemplary embodiment of this claimed feature, in step S40 of Fig. 7 of the

application,

> "a connection type included in the extracted connection management data 53a is changed from SVC/SPVC that is a dynamic connection to PSVC that is a static connection. Connection management data 53b is connection management data where the connection type is changed from SVC/SPVC that is a dynamic connection to PSVC that is a static connection." Page 14, lines 7-14 of the specification.

Next, in step S50,

> "dynamic information 54 of Fig. 8 set in SVC/SPVC that is a dynamic connection is stored." Page 14, lines 15-17 of the specification.

In other words, <u>Chiu et al.</u>, as cited and relied upon by the Examiner, fail to disclose,

> "[a] hardware connection data change device, comprising:
> a connection data management part configured to store and manage connection data on a connection of an associated switching unit, in which the connection data change device is provided, with an external switching unit; and
> a change operation part configured to change a type of the connection of the associated switching unit with the external switching unit in the connection data,
> wherein said change operation part changes the type of the connection to the external switching unit <u>from a variable connection type to a fixed connection type in the connection data, upon receiving a request to change the type of the connection to the external switching unit in the connection data after the connection of the variable connection type to the external switching unit is dynamically set up, before the set-up connection is reset</u>, and
> the connection data management part stores information on the connection of the variable connection type after the change operation part changes the type of the connection from the variable connection type to the fixed connection type in the connection data," as recited in claim 1. (Emphasis added)

Again, the claimed invention provides for changing the connection type in connection management data from a dynamic connection to a static connection, an exemplary embodiment of which is illustrated by step S40 in Fig. 7. And the claimed invention provides for storing the dynamic information set in the dynamic connection, an exemplary embodiment of which is illustrated by step S50 in Fig. 7. Thus, advantageously, the claimed invention provides for realizing "an operation process at the time of a static connection change ... by an operation process at the time of a dynamic connection change, thus simplifying an operation at the time of a connection change." Page 14, lines 24-28 of the specification.

Accordingly, Applicants respectfully submit that claim 1, together with claims 2-7 and 12 dependent therefrom, is patentable over <u>Chiu et al.</u> for at least the foregoing reasons. Claims 8-9 incorporate features that correspond to those of claim 1 cited above, and are, therefore, together with claims 10-11 and 13-14 dependent therefrom, respectively, patentable over <u>Chiu et al.</u> for at least the same reasons.

Correspondingly, with reference to Fig. 10, step S130 described in the specification illustrates an exemplary embodiment of the features of dependent claims 12-14,

> "since the extracted connection type is not a dynamic connection, the connections are reset by referring to the connection management data stored in the connection management data table 40." Page 15, lines 20-24 of the specification.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

84252248_1

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

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